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# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In Re:

Condado 5, LLC Appellant

V.

Las Martas, Inc. Jose R. Carrion, Ch. 12 Trustee Appellees

Debtor(s)

Case No.: 23-CV-01074 (RAM)

Appeal from the U.S. Bankruptcy Court for the District of Puerto Rico

#### MOTION FOR EXTENSION OF TIME TO FILE APPELLEE BRIEF

TO THE HONORABLE COURT:

COMES NOW, Appellee Jose R. Carrion-Morales, Chapter 12 Standing Trustee ("Appellee/Trustee"), through the undersigned attorney and, very respectfully, states and prays as follows:

- On March 19, 2023, Appellant Condado 5, LLC filed its Appellant Brief
  (Docket 9). This Honorable Court stated that Appellee Brief must be filed by today,
  May 30, 2023.
- 2. Appellee/Trustee is in the process of drafting his Appellee brief but needs additional time to finish drafting and to file the same.
- 3. In light of the above, the Appellee/Trustee requests an additional 30 days, or until June 29, 2023, to file his brief.

WHEREFORE, Appellee/Trustee requests that this Honorable Court grant him an extension of time up to and including June 29, 2023, to file his brief.

RESPECTFULLY SUBMITTED

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### Certificate of Service

I hereby certify, that on this same date, I electronically filed the foregoing with the Clerk of the Court using the Next Gen CM/ECF system, which will send notification of such filing to all Next Gen CM/ECF participants in this case including counsels for Appellant Condado 5, LLC and Co-Appellee Las Martas, Inc., as well as U.S. Trustee for Region 21.

In San Juan, Puerto Rico, this 30th day of May 2023.

JOSE R. CARRION MORALES CHAPTER 12 STANDING TRUSTEE Ochoa Building 500 Tanca St. Suite 502 San Juan, PR 00901

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/s/ Alexandra Rodríguez-Diaz Alexandra Rodríguez Diaz USDC No. 224311 arodriguez@ch13-pr.com